

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

Hearing Date: April 25, 2018  
Hearing Time: 10:00 a.m. (EST)  
Objections Due: April 20, 2018  
Objection Time: 5:00 p.m. (EST)

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and the Estate  
of Bernard L. Madoff,

Plaintiff,

v.

STANLEY SHAPIRO, *et al.*,

Defendants.

Adv. Pro. No. 10-05383 (SMB)

**NOTICE OF MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS**

Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701 *et seq.*, by and through his undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, Courtroom 723, New York, New York 10004, on April 25, 2018, at 10:00 a.m. EST, or as soon thereafter as counsel may be heard, for an order directing Defendants Stanley Shapiro, David Shapiro, Kenneth Citron and Leslie Shapiro Citron to produce all documents responsive to the Trustee’s requests directed at them, as more particularly set forth in the accompanying Memorandum of Law and Exhibit A.

Any responses or objections to this Motion must be in writing, conform to the Federal Rules of Bankruptcy Procedure, other applicable rules, and orders of this Court, and shall be filed in accordance with General Order M-399 and the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York (available at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by no later than **April 20, 2018** (the “Objection Deadline”) (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker and Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, James H. Rollinson, and Torello H. Calvani, and (b) Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington, D.C. 20006-1620, Attn: Kevin H. Bell, so as to be received no later than the Objection Deadline. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

Notice of this motion will be provided by U.S. Mail or email to all defendants in this adversary proceeding pursuant to the Order Establishing Notice Procedures (Adv. Pro. No. 08-01789 (SMB), ECF No. 4560). The Trustee submits that no other or further notice is required.

Dated: April 5, 2018  
New York, NY

**BAKER & HOSTETLER LLP**

PNC Center  
1900 E. 9<sup>th</sup> Street, Suite 3200  
Cleveland, Ohio 44114  
Telephone: (216) 621-0200  
Facsimile: (216) 696-0740  
James H. Rollinson  
Email: jrollinson@bakerlaw.com

**BAKER & HOSTETLER LLP**

By: /s/ David J. Sheehan  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Torello H. Calvani  
Email: tcalvani@bakerlaw.com  
Nicholas M. Rose  
Email: nrose@bakerlaw.com

*Attorneys for Irving H. Picard,  
Trustee for the Substantively  
Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*